

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHSETTS

IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY CASES LITIGATION

MDL No. 2419

Master Dkt.: 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:  
All Actions

**UNOPPOSED MOTION FOR ENTRY OF AGREED ORDER**

The Plaintiffs' Steering Committee (PSC) hereby moves the Court for entry of the Agreed Order, attached hereto as Exhibit 1, extending the time for filing responses to The Tennessee Defendants' Motion to Dismiss the Plaintiffs' Complaints for Failure to Comply with Tenn. Code Ann. §29-26-121 (dkt. no. 770) and Motion to Dismiss for Failure to Comply with Tennessee Health Care Liability Act (dkt. no. 779). The Defendants that filed those motions<sup>1</sup> assent to the entry of the Agreed Order, which is consistent with the agreement of the parties announced by the PSC at the March 13, 2014 status hearing.

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<sup>1</sup> The defendants filing the motions to dismiss are: St. Thomas Outpatient Neurosurgical Clinic, LLC, Howell Allen Clinic, John W. Culclasure, M.D., Debra Schamberg, R.N., Specialty Surgery Center, Crossville, PLLC, Kenneth Lister, M.D., and Kenneth Lister, M.D., P.C. (dkt. no. 770); and Saint Thomas West f/k/a Saint Thomas Hospital, Saint Thomas Network, Saint Thomas Health, Ascension Health Alliance, and Ascension Health (dkt. no. 779).

Respectfully submitted,

**PLAINTIFFS STEERING COMMITTEE**

Dated: March 20, 2014

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*Plaintiffs Steering Committee*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served via the Court's electronic filing system on  
March 20, 2014.

/s/ Mark P. Chalos

Mark P. Chalos